

## UNITED STATES DISTRICT COURT

for the

WESTERN District of WISCONSIN

FILED/REC'D

2022 MAY 23 A 8:46

Division

CLERK OF COURT  
U.S. DISTRICT COURT  
WD OF WI

HERU SPENCER &amp; Church Of Prismatic Light

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TIFFANY WAIT

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 22CV257

(to be filled in by the Clerk's Office)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Heru Spencer

Street Address Po Box 1376

City and County Bozeman

State and Zip Code MT, 59771

Telephone Number 4062196300

E-mail Address president@djediorder.org

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	TIFFANY WAIT
Job or Title ( <i>if known</i> )	3030 NORTHWEST EXPRESSWAY SUITE 200,#126
Street Address	
City and County	OKLAHOMA CITY
State and Zip Code	OK, 73112
Telephone Number	4098773314
E-mail Address ( <i>if known</i> )	TIFFANY@PRISMATICLIGHTCHURCH.ORG

## Defendant No. 2

Name	katrina wolff
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	jeri clark
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	ida hamilton
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

E-mail Address (if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Heru Spencer, is a citizen of the  
State of (name) wisconsin.

**b. If the plaintiff is a corporation**

The plaintiff, (name) the church of prismatic light, is incorporated  
under the laws of the State of (name) montana,  
and has its principal place of business in the State of (name)  
montana.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) tiffany wait, is a citizen of

## Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

the State of *(name)* oklahoma . Or is a citizen of  
*(foreign nation)* \_\_\_\_\_ .

## b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_ , is incorporated under  
 the laws of the State of *(name)* \_\_\_\_\_ , and has its  
 principal place of business in the State of *(name)* \_\_\_\_\_ .  
 Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_ ,  
 and has its principal place of business in *(name)* \_\_\_\_\_ .

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Tiffany Wait used my religious organizations name church of prismatic light to start one of her own in oklahoma with the same name, she has gathered 170,000 members and started raising donations using the church of prismatic light, which is my trademarked intellectual property. She has slandered & defamed me & my organization church of prismatic light & Djedi Order publicly, in the press on social media & sent her followers to do the same, they have also threatened my life. I started a case in wisconsin, case # 22-191593, Maili Rafaele has also slandered & defamed me , my organization the church of prismatic light & Djedi Order, & has aided in harassing & damaging my & my religious organizations reputations irrevesibly. Tifanny has taken members that would have belonged our organizations, donations & ruined mine & my organizations public reputations permanently. By using social media to lie about me and my organizations, using her 400,000 online followers.

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

## A. Where did the events giving rise to your claim(s) occur?

Tiffany Wait used my religious organizations name church of prismatic light to start one of her own in oklahoma with the same name, she has gathered 170,000 members and started raising donations using the church of prismatic light, which is my trademarked intellectual property. She has slandered & defamed me & my organization church of prismatic light & Djedi Order publicly, in the press on social media & sent her followers to do the same, they have also threatened my life. I started a case in wisconsin, case # 22-191593, Maili Rafaele has also slandered & defamed me , my organization the church of prismatic light & Djedi Order, & has aided in harassing & damaging my & my religious organizations reputations irrevesibly. Tifanny has taken members that would have belonged our organizations, donations & ruined mine & my organizations public reputations permanently. By using social media to lie about me and my organizations, using her 400,000 online followers.

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- B. What date and approximate time did the events giving rise to your claim(s) occur?

05/20/2022

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

tiffany has taken members from me, donations using my intellectual property, defamed , harassed, & slandered me online in the public, permanantly damaging my & my religious organizations reputations permanently we will never recover the damages caused by this. & they continue to damage my & my organizations reputation daily.

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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

tiffany has taken members from me, donations using my intellectual property, defamed , harassed, & slandered me online in the public, permanantly damaging my & my religious organizations reputations permanently we will never recover the damages caused by this. Even if she were to publically apologize the lies told will forever linger over me & my organizations. plus the death threats will continue. money will not compare to the good i could have done with my christain church of prismatic light.

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**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

My organization & I are requesting that tiffany take her social media associated with the church of prismatic light & slanderous videos & media down as an immediate action to avoid further damages. Apologize for using my intellectual Property, admit it was my idea and intellectual property, apologize publicly on her social media & via the media of her lies & harm she has caused. the 7 million is for the permanent damages caused to my organizations & my own reputations. It has gone too far your honorable judge, with her followers threatening my life & livelihood.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/19/2022

Signature of Plaintiff

Printed Name of Plaintiff

  
Heru Spencer

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

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Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address